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Attorneys for Defendants

NATIONSTAR MORTGAGE, LLC;

U.S. BANK, NATIONAL ASSOCIATION,

SUCCESSOR TRUSTEE TO BANK OF

AMERICA, N.A., SUCCESSOR BY

MERGER TO LASALLE BANK, N.A.,

AS TRUSTEE TO THE HOLDERS OF

THE ZUNI MORTGAGE LOAN TRUST

2006-OA1, MORTGAGE LOAN

PASS-THROUGH CERTIFICATES,

SERIES 2006-OA1 *erroneously sued as*

U.S. BANK NATIONAL ASSOCIATION and

VERIPRISE PROCESSING SOLUTIONS, LLC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

NATHANIEL J. FRIEDMAN,

Plaintiff,

v.

U.S. BANK NATIONAL
ASSOCIATION; BANK OF AMERICA,
N.A.; NATIONSTAR MORTGAGE,
LLC, a Delaware Limited Liability
Company; VERIPRISE PROCESSING
SOLUTIONS, LLC, a Delaware Limited
Liability Company; AZTEC
FORECLOSURE CORPORATION; and
DOES 1 through 10, inclusive,

Defendants.

Case No. 2:16-cv-02265-CAS-FFM

(Hon. Christina A. Snyder)

**DECLARATION OF PARISA
JASSIM IN SUPPORT OF
MOTION TO SET ASIDE
DEFAULT**

Date: January 9, 2017

Time: 10:00 a.m.

Courtroom: 5

Documents Concurrently Filed:

1. Notice of Motion and Motion

2. [Proposed] Order

Complaint filed: April 1, 2016

FAC filed: June 20, 2016

SAC filed: September 26, 2016

Trial: None

DECLARATION OF PARISA JASSIM

I, Parisa Jassim, declare as follows:

1. I am licensed to practice law in the State of California and am an associate in the law firm of Akerman LLP, counsel of record for defendants Nationstar Mortgage LLC (**Nationstar**) and U.S. Bank, National Association, Successor Trustee to Bank of America, N.A., Successor by Merger to LaSalle Bank, N.A., as Trustee to the Holders of the Zuni Mortgage Loan Trust 2006-OA1, Mortgage Loan Pass-Through Certificates, Series 2006-OA1 *erroneously sued as* U.S. Bank National Association (**U.S. Bank**) and Veriprise Processing Solutions, LLC (**Veriprise**) (collectively, **defendants**) in this action. If called as a witness, I could and would testify competently from personal knowledge as to each of the facts set forth in this Declaration. This Declaration is offered in support of Veriprise's Motion to Set Aside Default (**Motion**).

2. On April 19, 2016 I reasonably believed I was retained to represent only defendants Nationstar and U.S. Bank in this action.

3. As such, I did not file responsive pleadings on behalf of defendant Veriprise to the complaints filed by plaintiff.

4. On April 7, 2016, plaintiff filed proof of service of summons and complaint as to Veriprise. *See* docket.

5. On November 14, 2016, this Court granted defendants Nationstar and U.S. Bank's motion to dismiss plaintiff's second amended complaint with prejudice as well as order plaintiff to show cause no later than November 29, 2016 why this action should not be dismissed for lack of prosecution as to defendant Veriprise. *See* docket.

6. On November 15, 2016, plaintiff filed a request for entry of default as to Veriprise which this Court entered on November 17, 2016. *See* docket.

7. Following the filing of plaintiff's request for entry of default, I learned that Veriprise had believed they were included in my representation of U.S. Bank and Nationstar. The error was a result of my excusable mistake. Upon discovering they

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1 were not originally included in my representation of co-defendants, Veriprise asked
2 that I rectify the error and represent them in the action going forward.

3 I declare under penalty of perjury under the laws of the State of California and
4 under the laws of the United States of America that the foregoing is true and correct.

5 This declaration was executed on December 5, 2016 at Los Angeles, California.

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7 /s/ Parisa Jassim
8 Parisa Jassim, Declarant
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PROOF OF SERVICE

I am employed in the City and County of Los Angeles, California. I am over the age of 18 and not a party to the within action. My business address is 725 South Figueroa Street, 38th Floor, Los Angeles, California 90017.

On **December 5, 2016**, I served the following documents

**DECLARATION OF PARISA JASSIM IN SUPPORT OF
MOTION TO SET ASIDE DEFAULT**

on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes addressed as follows:

VIA OVERNIGHT MAIL

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Attorney for Plaintiff
NATHANIEL J. FRIEDMAN

VIA ECF SERVICE

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BANK OF AMERICA, N.A.

VIA ECF SERVICE

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**AZTEC FORECLOSURE
CORPORATION**

☒ (OVERNIGHT DELIVERY) I deposited in a box or other facility regularly maintained by Federal Express, an express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed as stated above, with fees for overnight delivery paid or provided for.

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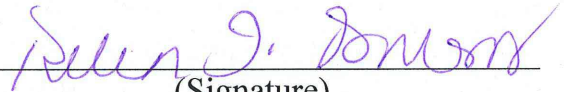
1 ☒ (CM/ECF ELECTRONIC FILING) I caused the above document(s) to be
2 transmitted to the office(s) of the addressee(s) listed above by electronic mail at
3 the e-mail address(es) set forth above pursuant to Fed.R.Civ.P.5(d)(1). "A Notice
4 of Electronic Filing (NEF) is generated automatically by the ECF system upon
5 completion of an electronic filing. The NEF, when e-mailed to the e-mail address
6 of record in the case, shall constitute the proof of service as required by
7 Fed.R.Civ.P.5(d)(1). A copy of the NEF shall be attached to any document
8 served in the traditional manner upon any party appearing pro se."

9 ☐ (State) I declare under penalty of perjury under the laws of the State of California
10 that the above is true and correct.

11 ☒ (Federal) I declare that I am employed in the office of a member of the Bar of this
12 Court at whose direction the service was made. I declare under penalty of
13 perjury under the laws of the United States of America that the above is
14 true and correct.

15 Executed on December 5, 2016, at Los Angeles, California.

16
17 Helen E. Serrano
18 (Type or print name)

19 
20 (Signature)

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